

Tammie Olsen

From: Brian Bibb
Sent: Thursday, August 27, 2020 11:36 AM
To: Tammie Olsen
Subject: FW: Collegedale/Duckett
Attachments: 2020-08-27 Curtis Bowe Ltr..pdf

From: Teresa Lindbert
Sent: Thursday, August 27, 2020 11:35 AM
To: curtisbowe@boweandassociates.com
Cc: Brian Bibb
Subject: Collegedale/Duckett

Mr. Bowe,

Attached please find correspondence from Brian Bibb pertaining to the above-referenced matter. Please let me know if you have any problems opening the file.

Teresa Lindbert
Assistant to Reid A. Spaulding and Brian R. Bibb
865-637-1700 (office)
865-525-2514 (fax)
tlindbert@watsonroach.com



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August 27, 2020

**VIA EMAIL, FACSIMILE
& U.S. MAIL**

Curtis Bowe
707 Georgia Avenue, #301
Chattanooga, TN 37402

Re: Kolby Duckett, et al. v. Chief Brian Hickman, et al.
U.S. District Court No. 1:19-cv-00295

Dear Curtis:

I wanted to follow up again on the documents we sought from you by subpoena. As you recall, that subpoena was served on you about June 11, 2020 with a compliance date of June 29, 2020 at 10:00 AM. You and I spoke, and I indicated I had no issue with you having some additional time to produce responsive documents. You indicated you hoped to produce them around July 4. We spoke again at the end of July, and I advised you that we had party depositions scheduled the week of August 24th, and would need the documents prior to that date. You again indicated you would have them to me within a week. You and I spoke again on Friday, August 21st. I told you I needed these documents prior to the depositions commencing on August 25th. I did not receive them prior to those depositions beginning, which has prejudiced my client.

I have tried to be understanding on this. I know you have a busy practice, but you have relevant evidence in this case that I need in order to defend my client. We have another round of depositions beginning on September 9. Please produce those documents by close of business Tuesday, September 1st so I have time to review them and prepare for the depositions. If I don't have the documents by then, I will have no option but to seek relief from the Court. Again, I apologize for having to be insistent on this, but it has reached a point that my client will suffer further prejudice if the requested documents are not produced, and I have a duty to my client to follow up on this. Please give me a call if you want to discuss.

Very truly yours,

Brian R. Bibb (with permission fl)

Brian R. Bibb

BRB:

HP LaserJet 400 MFP M425dn

Fax Confirmation

Aug-27-2020 11:44AM

Job	Date	Time	Type	Identification	Duration	Pages	Result
6827	8/27/2020	11:43:26AM	Send	14234756072	1:02	1	OK

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